

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
PAMELA SCHAEFFER- HANSBERRY	:	VIOLATIONS:
	:	18 U.S.C. § 1341
	:	(Mail fraud - 2 Counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Fastener Systems, Inc. ("Fastener"), 640 Snyder Ave., Bolomar Industrial Center, West Chester, Pennsylvania, was a company that distributed industrial fasteners (i.e. nuts, bolts, screws, etc.) to contractors and other commercial enterprises.

2. Defendant PAMELA SCHAEFFER- HANSBERRY was Fastener's bookkeeper and office manager. Her duties included, among other things, keeping Fastener's books, paying invoices submitted by Fastener's creditors and generating Fastener's payroll checks.

3. Only Fastener's president, J.S. ("defendant's employer"), and his wife, C.S., had authority to sign Fastener checks. Defendant PAMELA SCHAEFFER- HANSBERRY did not have authority to sign Fastener checks.

THE SCHEME

4. From in or about January 1994, through on or about March 13, 2000, in the Eastern District of Pennsylvania and elsewhere, defendant

PAMELA SCHAEFFER HANSBERRY

devised and intended to devise a scheme to defraud Fastener, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

5. It was part of the scheme that defendant PAMELA SCHAEFFER-HANSBERRY caused Fastener to suffer losses in the amount of approximately \$380,963.81 by:

(a) forging her employer's signature on Fastener checks which she used to pay personal debts, including various credit card bills, and covering up her fraud by doctoring Fastener's general ledger so that it reflected that the forged checks were made payable to Fastener vendors, and

(b) forging her employer's signature on unauthorized Fastener payroll checks, which checks she made payable to herself and ultimately cashed.

It was further part of the scheme that:

6. From in or about 1994 through in or about 2000, defendant PAMELA SCHAEFFER- HANSBERRY repeatedly forged her employer's signature on Fastener checks, which checks defendant used to pay her creditors, including but not limited to, MBNA.

7. From in or about 1994 through in our about 2000, defendant PAMELA SCHAEFFER- HANSBERRY repeatedly forged her employer's signature on unauthorized Fastener payroll checks which checks were made payable to, and ultimately cashed by, defendant PAMELA SCHAEFFER- HANSBERRY.

8. On or about December 20, 1999, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme, defendant

PAMELA SCHAEFFER- HANSBERRY

for the purpose of executing the scheme and attempting to do so, knowingly caused to be delivered from the Eastern District of Pennsylvania, by the United States Postal Service, according to directions thereon, an envelope containing a Fastener check in the amount of \$12,853.33, made payable to MBNA , which envelope was addressed and delivered to MBNA at 1100 North King St., Wilmington, Delaware 19884.

In violation of Title 18, United States Code, Section 1341.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. The allegations in paragraphs 1 through 7 are re-alleged here.
2. On or about March 23, 2000, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme, defendant

PAMELA SCHAEFFER- HANSBERRY

for the purpose of executing the scheme and attempting to do so, knowingly caused to be

delivered from the Eastern District of Pennsylvania, by the United States Postal Service, according to directions thereon, an envelope containing a Fastener check in the amount of \$21,897.51, made payable to MBNA, which envelope was addressed and delivered to MBNA, 1100 N. King St., Wilmington, Delaware 19884.

In violation of Title 18, United States Code, Section 1341.

PATRICK L. MEEHAN

United States Attorney